

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE: Joint Petition for Purchase and Sale of Assets
by The Narragansett Electric Company and the
Southern Union Company

Docket No. D-06-13

Petition for Intervention
Rule 17

Now comes the City of Providence (“Providence”), pursuant to Rule 17 of the Division of Public Utilities and Carriers’ Rules of Practice and Procedure, and hereby files its request to intervene in the above-captioned matter. In support, Providence states as follows:

1. Both petitioners are utility companies physically located within the City of Providence, and providing utility service to the taxpayers of Providence as well as ratepayers located elsewhere in the State of Rhode Island.
2. Providence has played an active role in proceedings before the Federal Energy Regulatory Commission (“FERC”) involving KeySpan LNG, L.P. (“KeySpan”) which originally sought authorization to make certain changes necessary to permit the facility to accept deliveries of liquefied natural gas via tankers which would travel up Narragansett Bay. The FERC rejected KeySpan’s petition as well as a request for rehearing, in part based upon the footprint of the KeySpan site, which was inadequate to provide the “exclusion zones” required to protect members of the public from a catastrophic LNG incident. KeySpan has now filed a petition for review in the Court of Appeals for the District of Columbia Circuit.
3. While no one other than reporters from the *Providence Journal* is asserting that the present joint petition is the first step in a stratagem by National Grid to gain control of the

properties abutting KeySpan, to acquire KeySpan's assets, and eventually to petition FERC to permit the construction of yet another LNG storage facility at the site, Providence remains concerned about the possibility. To that end, Providence has, through Mayor Cicilline, sent a letter to the chairman of FERC requesting that this purchase and sale and any subsequent transactions be very carefully reviewed.

4. Providence believes that its intervention is in the public interest, as protective of both the interests of the City and its taxpayers and ratepayers, and of those living elsewhere in the State of Rhode Island who might be affected by the developments at the KeySpan facility.

Respectfully submitted,

The City of Providence,

By its Attorney,

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Dated: March 29, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the within was mailed to the following on this 29th day of March, 2006.

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